

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<u>INFORMATION</u>
	:	
- v. -	:	20 Cr. 692
	:	
ERIC IAN WHITEHEAD,	:	
	:	
Defendant.	:	
- - - - -	X	

**COUNT ONE**

**(Wire Fraud)**

The United States Attorney charges:

1. From at least in or about 2015 up to and including in or about 2020, in the Southern District of New York and elsewhere, ERIC IAN WHITEHEAD, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, WHITEHEAD arranged for wire transfers and cash deposits benefitting himself from a victim company ("Company-1") where WHITEHEAD was then employed, without authorization from Company-1, as part of a scheme to embezzle funds from Company-1.

(Title 18, United States Code, Sections 1343 and 2.)

**FORFEITURE ALLEGATION**

2. As the result of committing the offense charged in Count One of this Information, ERIC IAN WHITEHEAD, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



Audrey Strauss  
Acting United States Attorney

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(18 U.S.C. §§ 1343 and 2.)

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AUDREY STRAUSS  
Acting United States Attorney

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